

FILED

February 03, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

BY: MGR
DEPUTY

MARK ORTEGA, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

ENSURETY VENTURES, a Missouri
Limited Liability Company,

Defendant.

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Case No. 5:24-CV-00801-OLG

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT'S MOTION TO DISMISS**

COMES NOW, Mark Ortega, Plaintiff, pro se, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule CV-7(d)(2) of the United States District Court for the Western District of Texas. In support of this motion, Plaintiff states as follows:

1. On October 14, 2024, Defendant Ensurety Ventures, LLC filed a Motion to Dismiss (ECF No. 4) in this Telephone Consumer Protection Act (TCPA) class action lawsuit.

2. Plaintiff was previously represented by counsel, Attorney Paulina Almanza, who was forced to withdraw from the case due to health issues.

3. Attorney Almanza filed a motion to withdraw on October 21, 2024 (ECF No. 5), which was approved by this Court on January 31, 2025 (ECF No. 13).

4. Plaintiff is now proceeding pro se and requires additional time to prepare an adequate response to the Motion to Dismiss.

5. Plaintiff respectfully requests an extension of time until February 14, 2025, to file his response to the Motion to Dismiss.

6. This extension is necessary to allow Plaintiff, now proceeding pro se, sufficient time to review the case file, research the applicable law, and prepare a comprehensive response to the Motion to Dismiss.

7. This motion is made in good faith and not for the purpose of delay.

8. The requested extension will not unduly prejudice any party or cause undue delay in the proceedings.

9. The Court has discretion to extend time limits for good cause under Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule CV-7(d)(2).

WHEREFORE, Plaintiff Mark Ortega respectfully requests that this Court grant an extension of time until February 14, 2025, to file his response to Defendant's Motion to Dismiss (ECF No. 4).

DATED this 3rd day of February 2025.

Respectfully submitted,

/s/ Mark Anthony Ortega
Mark Anthony Ortega
Plaintiff
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CERTIFICATE OF CONFERENCE

I, Mark Ortega, hereby certify that on February 3, 2025, I conferred with Jamey R. Campellone, counsel for Defendant, regarding the relief requested in this motion. Mr. Campellone indicated that Defendant does **not** oppose the motion.

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Attorneys for Defendant Ensurety Ventures, LLC

/s/ Mark Anthony Ortega

Mark Anthony Ortega

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument has been properly delivered pursuant to the Texas Rules of Civil Procedure on February 3, 2025 to the following counsel of record:

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/s/ Mark Anthony Ortega

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